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To the Federal Communications Commission:

In regards to the **Dual Network Ban** imposed by the FCC, I would like to formally make suggestions in order to help revise what I believe is a flawed concept. Prior to these suggestions and claims, I would like to clearly state that I do NOT believe the dual network ban should be eliminated, but rather modified to stop companies from owning multiple networks, such as up-and-coming networks like UPN or WB. Allowing the top four networks – ABC, NBC, CBS, and FOX – to own these smaller networks will only reduce competition in the marketplace and limit or remove outside ideas to promote the ideals best for the larger companies.

According to the description on the FCC's webpage, the dual network rule "permits common ownership of multiple broadcast networks but prohibits a merger between or among the 'top four' networks." My main concern lies in the ownership factor and its impact on public well-being. For example, CBS bought UPN and saved it from. In the process, CBS acquired a new platform to propagate its ideas/ideals to a station that addresses minorities which limits the range of new ideas. While the other networks could scramble quickly and buy the WB or another remaining small station and do the same thing, this would only lead to two different ends: 1. the overwhelming influence of only four different viewpoints through the different stations owned by each of the 'top four' networks; 2. the loss of competition as all the smaller networks are being bought out by larger companies.

While the names might not merge, and the programming may not change much, the content in each program and the place where all revenue ends will be drastically different. In a statement by Chairman Michael K. Powell, he states that maintaining the rule as it is might jeopardize diversity, using the ownership of UPN by CBS as an example. He states:

The failure of this network would result in a loss of a diversity of programming at the national level; programming that makes an important contribution to minority and urban audiences.

Furthermore, outlet diversity at the local level would also be jeopardized if the stability of the affiliates was put at risk

Because CBS has already claimed its ownership over UPN it remains successful and continues broadcasting. While this may seem like a good thing on the surface, giving CBS the ownership and power to dictate the broadcasts on UPN only reinforces the argument that allowing ownership will promote only the 'top four's' perspectives.

Commissioner Gloria Tristani said that while the statement, "A duopolized UPN is better than a dead UPN", may be true, the question raised in the elimination of the dual network ban is "not whether the financial difficulties of a network are enough to justify the elimination of the rule, but if the rule serves the public interest." Removing viewpoints from a smaller network in place of the already largely propagated ideas of a major network seems to only limit and hinder the growth of our culture and society. Chairman Powell stated in *Electronic Media* that "the failure of this network [UPN] would result in a loss of diversity," and sadly the weakness of the current regulation has led UPN to the brink of extinction without the support of a larger network company.

The only method I see to improve the dual network ban is to take away the ability for the four major networks to own smaller stations. I do realize that this will mean the loss of stations such as UPN, but in a free market system, the strongest survive and the weak perish. If there is a concern about the major networks swamping smaller networks and killing them off, then there should be another motion set in place to counteract the problem.

According to the Radio-Television News Directors Association and Foundation, the FCC has already determined that the dual network ban is "necessary to promote competition in the national television advertising and program acquisition markets, and promotes localism by preserving the balance of negotiating power between networks and affiliates." I simply don't see how propagating the ideas of four major powers through the lesser networks, will help the public. It limits competition by reducing the active parties, and condenses power into the major powers thus limiting the promotion of different ideals, and degrading the public's well-being into the specially crafted state formed by the major network stations.

I thank you for your time in reading my comments and suggestions.

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